

WWR# 21401175

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
John Stapleton

Debtor

KeyBank, N.A.

Movant

CASE NO. 17-17793-amc
CHAPTER 7

Hearing Date: 03/26/2018
Hearing Time: 11:00 am

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produces for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the payment due on 12/07/2016 through and including 02/07/2018, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Nathalie Paul

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